

THOMAS R. FRENCH  
THOMAS R. FRENCH, P.C.  
125 S. Howes St., Suite 401  
Fort Collins, CO 80521  
(970) 484-0360: Telephone  
(970) 482-3148: Facsimile

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                         )  
                                )  
JANE JOYCE RICE; WATER GARDEN, )                              Docket No. 07-CV-019-B  
INC.; PERPETUAL LEGACY CORP.; )  
CARTE BLANCHE TRUST; & )  
NEWPORT TRUST CO., LTD.; )  
                                )  
Defendants.                 )

**MOTION TO WITHDRAW OF THOMAS R. FRENCH, P.C.**

The law firm of Thomas R. French, P.C., pursuant to U.S.D.C.L.R. 83.12.3, respectfully requests that it be allowed to withdraw from further representation of Defendants in this case. In support of this request, the law firm, through its representative Thomas R. French, states as follows:

1. Good cause exists to allow the requested withdrawal. Thomas R. French has been selected to serve as a district court judge in Larimer County, Colorado, said service to commence on January 6, 2011.
2. Counsel for the government, Mr. Michael Pittman, does not object to the requested withdrawal.
3. Mr. French is local counsel in this matter. The law firm of Ted Merriam has also been admitted to represent the Defendants *pro hac vice*, and this firm will continue to represent the Defendants.
4. Mr. French has spoken with Ms. Jane Joyce Rice about the requested withdrawal, and she does not object to the requested withdrawal.
5. Ms. Rice has been provided with written notice of the requested withdrawal, which is attached as Exhibit A, and has signed a written consent to withdraw, which is attached as Exhibit B.
6. Mr. Robert Moxley, PO Box 565, Cheyenne, WY has committed to serve as local counsel in this matter, and will enter his appearance when the requested withdrawal is approved by the Court.

WHEREFORE, based upon the foregoing, Thomas R. French respectfully requests that this Court allow the law firm of Thomas R. French, P.C. to withdraw from further representation of the Defendants in this matter.

Respectfully submitted this 22nd day of December, 2010.

THOMAS R. FRENCH, P.C.

/s/  
By: Thomas R. French  
125 S. Howes St., Suite 401  
Fort Collins, CO 80521  
Telephone: 970-484-0360  
Facsimile: 970-482-3148  
Email: [frenchlaw@frii.com](mailto:frenchlaw@frii.com)  
Attorney for Jane Joyce Rice, Water Garden,  
Inc., Perpetual Legacy Corp., Carte Blanche  
Trust, and Newport Pacific Trust Co., Ltd.

**Certificate of Service**

This document has been electronically filed in this Court this 22<sup>nd</sup> day of December, 2010, in compliance with the requirements for ECF in the United States District Court for the District of Wyoming, and service has been effected pursuant to that ECF filing.

/s/ \_\_\_\_\_

Thomas R. French



THOMAS R. FRENCH, P.C.

ATTORNEY AT LAW

December 14, 2010

**NOTICE OF WITHDRAWAL**

Ms. Jane Joyce Rice  
9 Pleasant Valley Lane  
Sheridan, WY 82801

Dear Ms. Rice:

As we discussed on the telephone this afternoon, I need to withdraw as local counsel in the case of *USA v. Rice, et.al*, 07 CV 19, in U.S. District Court in Wyoming because I am going to be a judge in Larimer County, Colorado starting on January 6, 2011.

As we further discussed, the rules of Court require that I get a signed consent to that withdrawal from you. I have enclosed such a form, and I ask that you would please sign and date that form, and return it to me in the enclosed envelope, as soon as possible.

We also discussed that Ted Merriam's firm will continue to represent you, and that I have lined up a Wyoming lawyer to act as "local counsel" on the above referenced case. If you were without a lawyer, you would be personally responsible for complying with the orders of court and time limitations of the local court rules and federal rules of procedure. But, you will be represented by Mr. Merriam's firm and by Mr. Robert Moxley, who will be the new local counsel. Mr. Moxley's address is 2718 O'Neill Avenue, PO Box 565, Cheyenne, WY 82003, and his telephone number is 307. 632. 1112.

Your prompt attention to this matter is greatly appreciated. Thank you very much for your assistance.

THOMAS R. FRENCH, P.C.

By: Thomas R. French

**EXHIBIT A**

THOMAS R. FRENCH  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

JANE JOYCE RICE; WATER GARDEN, )  
INC.; PERPETUAL LEGACY CORP.; )  
CARTE BLANCHE TRUST; & )  
NEWPORT TRUST CO., LTD.; )

Defendants. )

Docket No. 07-CV-019-B

**Written Consent to Withdraw from Jane Joyce Rice**

I, Jane Joyce Rice, hereby consent to the law firm of Thomas R. French, P.C., withdrawing from further representation of me in this matter. I have been advised pursuant to U.S.D.C.L.R. 83.12.3.

Dated this 19<sup>th</sup> day of December, 2010.

  
JANE JOYCE RICE

**EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                         )  
                                )  
JANE JOYCE RICE; WATER GARDEN, ) Docket No. 07-CV-019-B  
INC.; PERPETUAL LEGACY CORP.; )  
CARTE BLANCHE TRUST; & )  
NEWPORT TRUST CO., LTD.; )  
                                )  
Defendants.                 )

**ORDER GRANTING MOTION TO WITHDRAW  
OF THOMAS R. FRENCH, P.C.**

The Court, after having been fully advised in all pertinent matters, grants the Motion to Withdraw of Thomas R. French, P.C., and orders the law firm of Thomas R. French, P.C. withdrawn from further representation of the Defendants in this case.

Done this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

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DISTRICT COURT (MAGISTRATE) JUDGE